

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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NATALIE ORRICO,

Plaintiff,

x

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: Case No. 1:22-cv-03195  
:(NRM)(CLP)

v.

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NORDIC NATURALS, INC.,

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Defendant.

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x

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**DECLARATION OF PHILIP FURIA IN SUPPORT OF PLAINTIFF'S  
MOTION FOR A PROTECTIVE ORDER**

**I. INTRODUCTION**

I, Philip Furia, submit this Declaration in support of Plaintiff's Motion For A Protective Order, and affirm that the following is truthful and accurate:

1. I am an attorney duly admitted before this Court. I am partner at Sultzer & Lipari, PLLC and am one of the attorneys principally responsible for handling this case for Plaintiff and the proposed Class.

2. I am personally familiar with the facts set forth in this Declaration. If called as a witness, I could and would competently testify to the matters stated in this Declaration.

3. Attached as Exhibit A is a true and accurate copy of Defendant's First Set of Interrogatories to Plaintiff.

4. Attached as Exhibit B is a true and accurate copy of Defendant's First Set of Document Requests to Plaintiff.

5. Attached as Exhibit C is a true and accurate copy of the Subpoena served by

Defendant on Amazon, Inc.

**II. CONCLUSION**

For the reasons set forth in this declaration, Class Counsel respectfully requests that the Court grant Plaintiff's Motion For A Protective Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16<sup>th</sup> day of September, 2024 in Poughkeepsie, New York.

/s/ Philip Furia  
Philip Furia